

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CASE NO: 3 07-CV-00043 (DK)**

DONNA JEANNE FLANAGAN, on behalf of
herself and all others similarly situated
in the State of North Carolina

Plaintiff,

vs.

AU OPTRONICS CORP.; AU OPTRONICS
CORP. AMERICA; CHI MEI
OPTOELECTRONICS CO., LTD.; CHI MEI
OPTOELECTRONICS USA, INC.;
CHUNGHWA PICTURE TUBES; LTD.;
FUJITSU LIMITED, INC.; FUJITSU
AMERICA, INC.; HANNSTAR DISPLAY
CORPORATION; HITACHI, LTD.; HITACHI
DISPLAYS, LTD.; HITACHI AMERICA,
LTD.; IDTECH CO., LTD; IDTECH USA,
INC.; IPSA ALPHA TECHNOLOGY, LTD.;
LG.PHILIPS LCD CO., LTD.; LG.PHILIPS
LCD AMERICA, INC.; MATSUSHITA
ELECTRIC INDUSTRIAL CO. LTD.;
PANASONIC CORPORATION OF NORTH
AMERICA; MITSUBISHI ELECTRIC
CORPORATION; MITSUBISHI ELECTRIC
& ELECTRONICS USA, INC.; NEC
ELECTRONICS CORPORATION; NEC
ELECTRONICS AMERICA, INC.; NEC
LCD TECHNOLOGIES, LTD.; SAMSUNG
ELECTRONICS COMPANY LTD.;
SAMSUNG ELECTRONICS AMERICA;
SANYO ELECTRIC CO., LTD.; SANYO
NORTH AMERICA CORPORATION;
EPSON IMAGING DEVICES CORPORATION;
SEIKO EPSON CORPORATION; EPSON
AMERICA, INC.; EPSON ELECTRONICS
AMERICA, INC.; SHARP CORPORATION;
SHARP ELECTRONICS CORPORATION;
SONY CORPORATION; SONY CORPORATION
OF AMERICA; SONY ELECTRONICS, INC.;
S-LCD CORPORATION; SYNTAX-BRILLIAN
CORP.; S-LCD CORPORATION; TOSHIBA
CORPORATION; TOSHIBA AMERICA INC.;
TOSHIBA MATSUSHITA DISPLAY
TECHNOLOGY CO., LTD.; and JOHN DOES
1-100

Defendants.

STIPULATION FOR EXTENSION OF TIME
AND PROPOSED ORDER

Plaintiff Donna Jeanne Flanagan and Defendant LG.Philips LCD America, Inc., through their respective attorneys, jointly submit for the Court's approval the following Stipulation for Extension of Time:

WHEREAS Plaintiff filed a complaint in the above-captioned case on or about January 30, 2007;

WHEREAS Plaintiff alleges antitrust violations by manufacturers of Liquid Crystal Display ("LCD") products;

WHEREAS more than fifty complaints have been filed to date in federal district courts throughout the United States by plaintiffs purporting to bring class actions on behalf of direct and indirect purchasers alleging antitrust violations by manufacturers of LCD products (collectively, "the LCD Cases");

WHEREAS there is a motion pending before the Judicial Panel on Multidistrict Litigation to transfer the LCD Cases to the Northern District of California for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

WHEREAS Plaintiff anticipates the possibility of Consolidated Amended Complaints in the LCD Cases;

WHEREAS Plaintiff and LG.Philips LCD America, Inc. ("LPL America") have agreed that an orderly schedule for any response to the pleadings in the LCD Cases would be more efficient for the parties and for the Court;

WHEREAS Plaintiff agrees that the deadline for LPL America to respond to the Complaint shall be extended until the earliest of the following dates: (1) forty-five days after the filing of a Consolidated Amended Complaint in the LCD Cases; (2) forty-five days after Plaintiff provides written notice to LPL America that she does not intend to file a Consolidated Amended Complaint, provided that such notice may be given only after the initial case management conference in the MDL transferee court in this case; or (3) as ordered by the MDL transferee court.

WHEREAS Plaintiff, LPL America, and any other named defendants that join this extension agree that notwithstanding the above paragraphs, should any defendant to whom this extension applies, except pursuant to Court Order, respond to any complaint in another LCD Case prior to the date contemplated by this Stipulation, then such defendant shall make a simultaneous response to the Complaint in the above-captioned matter.

WHEREAS Plaintiff further agrees that this extension is available, without further stipulation with counsel for Plaintiff, to all named defendants who notify Plaintiff in writing of their intention to join this extension;

WHEREAS Plaintiff, LPL America, and any other named defendants that provide notice of their intention to join this extension pursuant to the preceding paragraph agree that such defendant shall not contest the sufficiency of process or service of process. This Stipulation does not constitute a waiver of any other defense, including but not limited to the defenses of lack of personal or subject matter jurisdiction or improper venue.

PLAINTIFF AND DEFENDANT LPL AMERICA, BY AND THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:

1. The deadline for LPL America to respond to the Complaint shall be extended until the earliest of the following dates (1) forty-five days after the filing of a Consolidated Amended Complaint in the LCD Cases; (2) forty-five days after the Plaintiff provides written notice that she does not intend to file a Consolidated Amended Complaint, provided that such notice may be given only after the initial case management conference in the MDL transferee court in this case; or (3) as ordered by the MDL transferee court.

2. This extension is available, without further stipulation with counsel for Plaintiff or further order of the Court, to all named defendants who notify Plaintiff in writing of their intention to join this extension.

3. Plaintiff, LPL America, and any other named defendants that provide notice of their intention to join this extension pursuant to the preceding paragraph agree that such defendant shall not contest the sufficiency of process or service of process. This Stipulation does

not constitute a waiver of any other defense, including but not limited to the defenses of lack of personal or subject matter jurisdiction or improper venue.

4. Plaintiff, LPL America, and any defendant joining this extension pursuant to paragraph 2 agree that notwithstanding the above paragraphs, should any defendant to whom this extension applies, except pursuant to Court Order, respond to any complaint in another LCD Case prior to the date contemplated by this Stipulation, then such defendant shall make a simultaneous response to the Complaint in the above-captioned matter.

IT IS SO STIPULATED.

Dated: February 23, 2007.

Respectfully submitted,

PARKER POE ADAMS & BERNSTEIN LLP

s/ William L. Rikard, Jr.

William L. Rikard, Jr.
N.C. Bar No. 3701
Kristin R. Poolos
N.C. Bar No. 31762
Three Wachovia Center
401 South Tryon Street, Suite 3000
Charlotte, NC 28202
Telephone: (704) 372-9000
Facsimile: (704) 334-4706
williamrikard@parkerpoe.com
kristinpoolos@parkerpoe.com

William S. Fultz
N.C. Bar No. 35009
Wachovia Capitol Center
150 Fayetteville Street Mall, Suite 1400
Post Office Box 389
Raleigh, NC 27602
Telephone: (919) 828-0564
Facsimile: (919) 834-4564
evanfultz@parkerpoe.com
*Attorneys for Defendant LG.Philips LCD
America, Inc.*

Of Counsel:

Michael R. Lazerwitz
Jeremy J. Calsyn
Lee F. Berger
CLEARY GOTTlieb STEEN & HAMILTON LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006
Telephone: (202) 974-1500
Facsimile: (202) 974-1999

Dated: February 23, 2007.

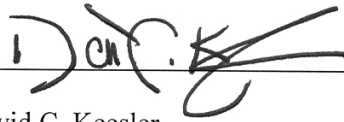
WYATT & BLAKE, LLP

By: s/ James F. Wyatt, III (by permission)

James F. Wyatt, III
*Attorney for Plaintiff Donna Jeanne
Flanagan*

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Signed: April 6, 2007



David C. Keesler
United States Magistrate Judge



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 23rd day of February, 2007, I caused a copy of the foregoing ***Stipulation For Extension of Time and Proposed Order*** and ***Corporate Disclosure Statement*** to be electronically filed with the Clerk of Court using the CM/EF system, which will send notification and a copy of such filing to the following:

James F. Wyatt, III
Wyatt & Blake, LLP
435 East Morehead St.
Charlotte, NC 28202
jfw@wyattlaw.net
Counsel for Plaintiff Donna Jeanne Flanagan

Raboteau Terrell Wilder, Jr.
Nelson Mullins Riley & Scarborough LLP
100 N. Tryon St., Suite 2400
Charlotte, NC 28202-4000
rob.wilder@nelsonmullins.com
*Counsel for Defendants Sony Corporation, Sony Corporation of America
and Sony Electronics, Inc.*

The undersigned further certifies that on this day I caused a copy of the foregoing ***Stipulation For Extension of Time and Proposed Order*** and ***Corporate Disclosure Statement*** to be served upon the following, who are not participants in the CM/ECF system, by depositing copies of the same in the United States mail, first class postage prepaid, addressed as follows:

AU Optronics Corp. America
Attn: President/CEO
9720 Cypresswood Drive
Suite 241
Houston, TX 77070
AU Optronics Corp. America
c/o CT Corporation System
818 West 7th Street
Los Angeles, CA 90017

Chi Mei Optoelectronics USA Inc.
Attn: President/CEO
101 Metro Drive
Suite 510
San Jose, CA 95110

Chi Mei Optoelectronics USA Inc.
c/o Junichi Ishii
956 Wallace Drive
San Jose, CA 95120

Epson Electronics America, Inc.
Attn: President/CEO
2580 Orchard Parkway

Hitachi America Ltd.
Attn: President/CEO
2000 Sierra Point Parkway
Brisbane, CA 94005

ID Tech USA, Inc.
Attn: President/CEO
101 Metro Drive
Suite 510
San Jose, CA 95110
Matsushita Electric Industrial Co. Ltd.
d/b/a Panasonic
Attn: President/CEO
1 Rockefeller Plaza
Suite 1001

New York, NY 10020
Mitsubishi Electric & Electronics USA, Inc.
Attn: President/CEO
5665 Plaza Drive
P.O. Box 6007
Cypress, CA 90630
NEC Electronics America, Inc.
Attn: President/CEO
2880 Scott Blvd.

San Jose, CA 95131
Epson America, Inc.
Attn: President/CEO
3840 Kilroy Airport Way
Long Beach, CA 90806
Fujitsu America, Inc.
Attn: President/CEO
1250 E. Arques Avenue
M/S 124
Sunnyvale, CA 94085
Panasonic Corporation of America
Attn: President/CEO
1 Panasonic Way
Secaucus, NJ 07094
Syntax-Brilliant Corp.
Attn: President/CEO
1600 N. Desert Drive
Tempe, AZ 85281
Toshiba America, Inc.
Attn: President/CEO
1251 Avenue of the Americas
Suite 4110
New York, NY 10020
Sharp Corporation
Attn: President/CEO
Sharp Plaza
Mahwah, NJ 07430

Santa Clara, CA 95050-2554
S-LCD Corp.
c/o Brent Vincent Shelton
971 D Somerset Court
Chula Vista, CA 91915
NEC Electronics Corp.
Attn: President/CEO
1 Chase Manhattan Plaza
40th Floor
New York, NY 10081
Samsung Electronics America
Attn: President/CEO
105 Challenger Road
Ridgefield Park, NJ 07660
Sanyo North America Corp.
Attn: President/CEO
2055 Sanyo Avenue
San Diego, CA 92154
Sanyo North America Corp.
c/o CSC – Lawyers Incorporating Service
P.O. Box 526036
Sacramento, CA 95852-6036

Sharp Electronics Corporation
Attention: President/CEO
Sharp Plaza
Mahwah, NJ 07430

This 23rd day of February, 2007.

/s William L. Rikard, Jr.

William L. Rikard, Jr.
Three Wachovia Center
401 South Tryon Street, Suite 3000
Charlotte, NC 28202
Telephone: (704) 372-9000
Facsimile: (704) 334-4706